

Before the  
**Federal Communications Commission**  
 Washington, DC

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

)  
 )  
 Amendment of Section 73.202(b),  
 Table of Allotments,  
 FM Broadcast Stations  
 (Crawfordville, Georgia)

) **MB Docket No. 02-225**  
 ) **RM-10517**  
 )  
 )

To: Assistant Chief, Audio Services Division

**COUNTERPROPOSAL AND COMMENTS**

Sutton Radiocasting Corporation ("Sutton Radiocasting"), by its attorney, hereby submits a Counterproposal with respect to the above-referenced rulemaking matter. With respect thereto, the following is stated:

In lieu of the allotment of Channel 234A to Crawfordville, Georgia, Sutton Radiocasting proposes the allotment of Channel 234A as follows:

<u>Community</u>	<u>Current</u>	<u>Proposed</u>
Midway-Hardwick, Georgia	---	234A

Adoption of this proposal will be in the public interest. Attached hereto is a Technical Statement which demonstrates that Channel 234A can be allotted at 33° 09' 21" N, 83° 08' 20" W, which will prevent any short-spacing from occurring with any currently authorized or proposed facility. Attachment 1. Approval of this proposal will allow Sutton Radiocasting to provide new first local aural service to the public in Midway-Hardwick, Georgia. As seen in Attachment 2, Midway-Hardwick, Georgia is a Census Designated Place. Its population 2000 Census Population is 5,135 persons, with a land area of 12.693 sq. km. and approximately 1,978 families. In contrast, the Year 2000 Census population for "Crawfordville" is only 572 persons. Attachment 3. While the

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population of Midway-Hardwick is growing (having grown from 4910 persons according to the 1990 Census to 5135 persons according to the Year 2000 Census (Attachments 2 and 4), the population of "Crawfordville" has remained stagnant or *shrunk*, from "577" persons in 1990 to "572" persons in 2000. Attachments 3 and 5.

Each proponent proposes service under "Priority (3)" of the Commission's allotment priorities (*i.e.*, first local aural service). When dealing with competing "Priority (3)" proposals, the Commission favors the proposal contemplating new service to the larger of the competing communities. *Blanchard, Louisiana and Stephens, Arkansas*, 10 FCC Rcd 9828, ¶ 11 (1995); *Rose Hill, Trenton, Aurora, and Okracoke, North Carolina*, 15 FCC Rcd 10739 (Allocations Branch, 2000). Accordingly, as the larger community, it is clear Sutton Radiocasting's proposal for the Commission to provide a new allotment to the community of Midway-Hardwick is favored under the Commission's allotment priorities. *Revision of FM Assignment Policies and Procedures*, 90 F.C.C.2d 88 (1982). Sutton Radiocasting will apply for the allotment at such time as this proposal is adopted.

Accordingly, Sutton Radiocasting respectfully requests that this Counterproposal be adopted, that the Commission amend the FM Table of Allotments to specify the new channel at Midway-Hardwick, Georgia, and that the Commission request comment on the proposal contained herein.

Respectfully submitted,

**SUTTON RADIOCASTING  
CORPORATION**

By

Dan J. Alpert

Its Attorney

*The Office of Dan J. Alpert  
2120 N. 21<sup>st</sup> Rd.  
Arlington, VA 22201*

*703-243-8690*

*September 30, 2002*

***ATTACHMENT 1***

Technical Comments  
Proposed Rule Making  
To Add Channel 234 A  
Midway-Hardwick, Georgia  
September 2002

These comments are compiled on behalf of Sutton Radiocasting Corporation, proponent to allocate Channel 234 A at Midway-Hardwick, GA. This proposal is mutually exclusive with MB Docket No. 02-225, RM-10517 to allocate Channel 234 A at Crawfordville, Georgia.

ALLOCATION

The proposed allotment coordinates of North Latitude 33° 09' 21" and 83° 08' 20" meet all known spacing requirements as set forth in §73.207. Exhibit 1 is an allocation study confirming this.

COMMUNITY COVERAGE

Exhibit 2 is a depiction of the 70 dBu uniform terrain contour. 100% of Midway-Hardwick CDP is within this contour. Exhibit #3 is a portion of the more detailed Milledgeville, Georgia 7.5 minute topographic map. Midway-Hardwick is indicated on this map as Hardwick. In a recent telephone conversation, Assistant County Administrator Ralph McMullen also referred to Midway-Hardwick as Hardwick.

MIDWAY-HARDWICK AREA AND POPULATION

From the allocation coordinates, the 60 dBu contour of a maximum class facility would serve 2,503.32 square KM. Within this area are 67,588 persons according to the 2000 Census. City CDP of Midway-Hardwick has a population of 5130.<sup>1</sup>

CRAWFORDVILLE AREA AND POPULATION

From the mutually exclusive rule making proposal of Ritz Radio, we learn that Crawfordville has a 2000 Census population of only 572 persons. From the Ritz Radio allocation coordinates of North Latitude 33° 31' 18" and West Longitude 82° 56' 52" we have calculated 25,293 persons would reside within the 60 dBu contour which encompasses 2,505.74 square KM.

---

<sup>1</sup> According to the 2000 Census for the State of Georgia.

**MIDWAY-HARDWICK and CRAWFORDVILLE  
AREA AND POPULATION COMPARISON**

<u>Location</u>	<u>City Pop</u>	<u>60 dBu Pop<sup>2</sup></u>
Crawfordville	572	25,293
Midway-Hardwick	5130	67,588

**CURRENT BROADCAST SERVICES**

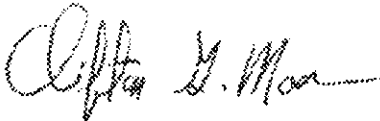
There are no known broadcast services allocated to either Midway-Hardwick or Crawfordville. Upon allotment to either town, this would be the first broadcast service licensed to either locality.

**CONCLUSION AND STATEMENT**

Midway-Hardwick has almost eight times the population of Crawfordville. Within the 60 dBu contour from the individual allotment references, the Sutton Radiocasting Corporation proposal for Midway-Hardwick will provide new service to about 1.6 times *more* persons than the Ritz Radio proposal at Crawfordville. Based on the Midway-Hardwick being a much larger community with no broadcast station and based on the fact that the Sutton Radiocasting Corporation proposal will serve many more persons than the Ritz Radio proposal, it is thought that Midway-Hardwick is more deserving of the allocation of Channel 234A.

When allocated to Midway-Hardwick, Sutton Radiocasting Corporation will timely file the requisite applications and paperwork to pursue this facility.

All representations contained therein are thought to be true, correct and accurate to the knowledge of the undersigned.



September 25, 2002

Clifton G. Moor  
Bromo Communications, Inc.

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<sup>2</sup> All population calculated within any 60 dBu contour utilized the 2000 Census.

# EXHIBIT 1

Bromo Communications, Inc.  
Atlanta, Georgia

New FM Proposal  
Midway-Hardwick, GA

REFERENCE

33 09 21 N

83 08 20 W

CLASS = A

Current Spacings

DISPLAY DATES

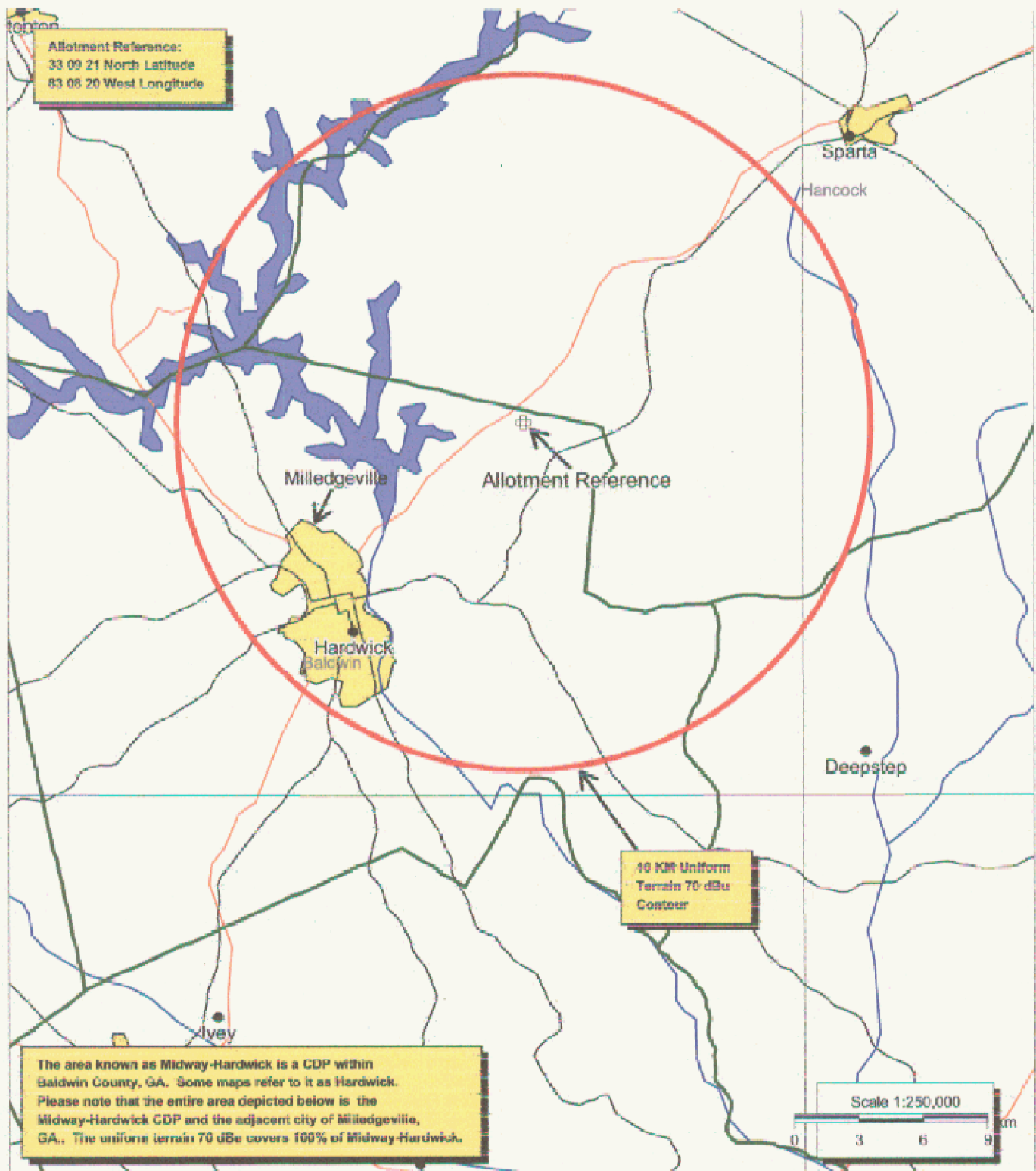
DATA 09-24-02

SEARCH 09-25-02

----- Channel 234 - 94.7 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
RADD	ADD 234A	Crawfordville	GA	44.30	23.5	115.0	-70.70 *
WPCH	LIC 235C1	Atlanta	GA	133.06	303.4	133.0	0.06
WBYZ	LIC 233C	Baxley	GA	165.09	156.8	165.0	0.09
ALLO	VAC 232A	Gibson	GA	50.91	75.6	31.0	19.91
960916	APP 232A	Gibson	GA	52.00	77.4	31.0	21.00
WAAW.A	APP 234A	Williston	SC	146.35	74.0	115.0	31.35
WMGB	LIC 236C2	Montezuma	GA	87.00	220.1	55.0	32.00
WSTR	LIC 231C	Smyrna	GA	129.84	301.5	95.0	34.84
WAYS	LIC 288C3	Macon	GA	46.84	232.1	12.0	34.84
WDECFM	LIC 234C3	Americus	GA	177.95	218.6	142.0	35.95
WAAW	LIC 234A	Williston	SC	152.23	76.0	115.0	37.23
WHKN	LIC 235C3	Millen	GA	128.31	111.2	89.0	39.31
WMUUFM	LIC 233C	Greenville	SC	209.13	18.5	165.0	44.13
WCHZ	LIC 236C3	Harlem	GA	94.59	66.9	42.0	52.59
RVAC	VAC 233A	Woodbury	GA	127.58	258.0	72.0	55.58

\* This proposal is being filed mutually exclusive with MB Docket No. 02-225 requesting to allocate Channel 234 A at Crawfordville, GA.



**Exhibit 2**  
**Sutton Radiocasting Corporation**  
**Proposed Rule Making**  
**234 A -94.7 mHz**  
**Midway-Hardwick, GA**

**Bromo Communications, Inc.**  
Atlanta, Georgia  
September 2002



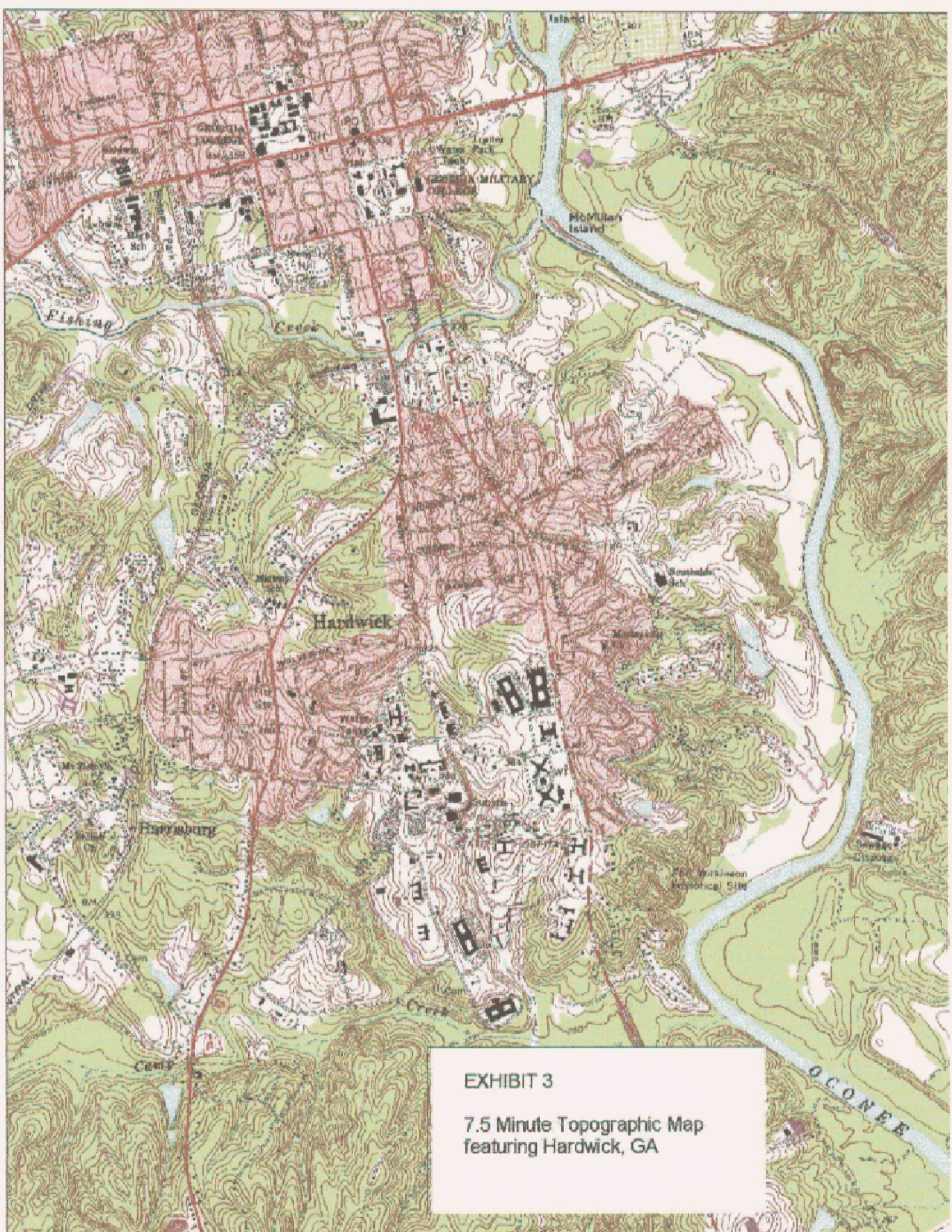


EXHIBIT 3

7.5 Minute Topographic Map  
featuring Hardwick, GA

© 2000 DeLorme. DeLorme 2000 Map Geographic. Data sources provided by USGS.

Scale: 1:25,000. Elevation: 12-4. Datum: NAD83

500 m

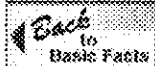
***ATTACHMENT 2***



## U.S. Census Bureau

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Quick Tables

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DP-1. Profile of General Demographic Characteristics: 2000  
 Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data  
 Geographic Area: **Midway-Hardwick CDP, Georgia**

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see  
<http://factfinder.census.gov/home/en/datanotes/expsf1u.htm>.

Subject	Number	Percent
<b>Total population</b>	<b>5,135</b>	<b>100.0</b>
<b>SEX AND AGE</b>		
Male	2,287	44.5
Female	2,848	55.5
Under 5 years	357	7.0
5 to 9 years	409	8.0
10 to 14 years	435	8.5
15 to 19 years	432	8.4
20 to 24 years	436	8.5
25 to 34 years	720	14.0
35 to 44 years	798	15.5
45 to 54 years	589	11.5
55 to 59 years	202	3.9
60 to 64 years	180	3.5
65 to 74 years	257	5.0
75 to 84 years	188	3.7
85 years and over	132	2.6
Median age (years)	32.0	(X)
18 years and over	3,678	71.6
Male	1,578	30.7
Female	2,100	40.9
21 years and over	3,397	66.2
62 years and over	671	13.1
65 years and over	577	11.2
Male	178	3.5
Female	399	7.8
<b>RACE</b>		
One race	5,082	99.0
White	1,285	25.0
Black or African American	3,726	72.6
American Indian and Alaska Native	22	0.4
Asian	33	0.6
Asian Indian	8	0.2
Chinese	0	0.0
Filipino	15	0.3
Japanese	0	0.0
Korean	3	0.1
Vietnamese	0	0.0
Other Asian <sup>1</sup>	7	0.1
Native Hawaiian and Other Pacific Islander	0	0.0

Native Hawaiian	0	0.0
Guamanian or Chamorro	0	0.0
Samoan	0	0.0
Other Pacific Islander <sup>2</sup>	0	0.0
Some other race	16	0.3
Two or more races	53	1.0
<b>Race alone or in combination with one or more other races <sup>3</sup></b>		
White	1,309	25.5
Black or African American	3,761	73.2
American Indian and Alaska Native	37	0.7
Asian	50	1.0
Native Hawaiian and Other Pacific Islander	2	0.0
Some other race	32	0.6
<b>HISPANIC OR LATINO AND RACE</b>		
Total population	5,135	100.0
Hispanic or Latino (of any race)	30	0.6
Mexican	10	0.2
Puerto Rican	2	0.0
Cuban	3	0.1
Other Hispanic or Latino	15	0.3
Not Hispanic or Latino	5,105	99.4
White alone	1,274	24.8
<b>RELATIONSHIP</b>		
Total population	5,135	100.0
In households	4,923	95.9
Householder	1,868	36.4
Spouse	580	11.3
Child	1,711	33.3
Own child under 18 years	1,170	22.8
Other relatives	481	9.4
Under 18 years	259	5.0
Nonrelatives	283	5.5
Unmarried partner	151	2.9
In group quarters	212	4.1
Institutionalized population	195	3.8
Noninstitutionalized population	17	0.3
<b>HOUSEHOLDS BY TYPE</b>		
Total households	1,868	100.0
Family households (families)	1,277	68.4
With own children under 18 years	639	34.2
Married-couple family	580	31.0
With own children under 18 years	249	13.3
Female householder, no husband present	566	30.3
With own children under 18 years	328	17.6
Nonfamily households	591	31.6
Householder living alone	477	25.5
Householder 65 years and over	117	6.3
Households with individuals under 18 years	771	41.3
Households with individuals 65 years and over	316	16.9
Average household size	2.64	(X)
Average family size	3.17	(X)
<b>HOUSING OCCUPANCY</b>		
Total housing units	2,223	100.0
Occupied housing units	1,868	84.0

Vacant housing units	355	16.0
For seasonal, recreational, or occasional use	20	0.9
Homeowner vacancy rate (percent)	2.9	(X)
Rental vacancy rate (percent)	15.1	(X)
<b>HOUSING TENURE</b>		
Occupied housing units	1,868	100.0
Owner-occupied housing units	1,153	61.7
Renter-occupied housing units	715	38.3
Average household size of owner-occupied unit	2.70	(X)
Average household size of renter-occupied unit	2.53	(X)

(X) Not applicable

<sup>1</sup> Other Asian alone, or two or more Asian categories.<sup>2</sup> Other Pacific Islander alone, or two or more Native Hawaiian and Other Pacific Islander categories.<sup>3</sup> In combination with one or more other races listed. The six numbers may add to more than the total population and the six percentages may add to more than 100 percent because individuals may report more than one race.

Source: U.S. Census Bureau, Census 2000 Summary File 1, Matrices P1, P3, P4, P8, P9, P12, P13, P17, P18, P19, P20, P23, P27, P28, P33, PCT5, PCT8, PCT11, PCT15, H1, H3, H4, H5, H11, and H12.

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\*\*\*\*

#### Community Mottos & Nicknames

\*\*\*\*

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**Midway-Hardwick**

**Georgia**

---

The Georgia state capital is Atlanta.

---

What would you like to know about Midway-Hardwick

Statistics & Facts

Community  
in  
Georgia

**Statistics & Facts**

\*\*\*\*  
Choose a new  
State

The population of Midway-Hardwick is approximately 4910.  
The approximate number of families is 1978.

\*\*\*\*  
Check out these  
Special Messages

The amount of land area in Midway-Hardwick is 12.693 sq. kilometers.  
The amount of surface water is 0.042 sq kilometers.  
The distance from Midway-Hardwick to Washington DC is 543 miles. The distance to the Georgia state capital is 85 miles. (as the crow flies)  
Midway-Hardwick is positioned 33.05 degrees north of the equator and 83.24 degrees west of the prime meridian.

\*\*\*\*  
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\*\*\*\*  
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## **Midway Hardwick**

1. **Midway-Hardwick, Georgia, United States** [CDP]; population was 4,910 in 1990; housing units was 1,978 in 1990; location is 33°3'N 83°15'W; land area is 4.90 square miles (3,137 acres); water area is 0.02 square miles (10 acres); FIPS code is 51394 [SourceCBP]

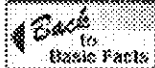


## ***ATTACHMENT 3***

## U.S. Census Bureau

American FactFinder

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## Quick Tables



DP-1. Profile of General Demographic Characteristics: 2000  
 Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data  
 Geographic Area: **Crawfordville city, Georgia**

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see  
<http://factfinder.census.gov/home/en/datanotes/expsf1u.htm>.

Subject	Number	Percent
<b>Total population</b>	<b>572</b>	<b>100.0</b>
<b>SEX AND AGE</b>		
Male	254	44.4
Female	318	55.6
Under 5 years	35	6.1
5 to 9 years	28	4.9
10 to 14 years	41	7.2
15 to 19 years	42	7.3
20 to 24 years	29	5.1
25 to 34 years	57	10.0
35 to 44 years	85	14.9
45 to 54 years	69	12.1
55 to 59 years	27	4.7
60 to 64 years	36	6.3
65 to 74 years	55	9.6
75 to 84 years	51	8.9
85 years and over	17	3.0
Median age (years)	42.0	(X)
18 years and over	440	76.9
Male	184	32.2
Female	256	44.8
21 years and over	417	72.9
62 years and over	147	25.7
65 years and over	123	21.5
Male	42	7.3
Female	81	14.2
<b>RACE</b>		
One race	569	99.5
White	237	41.4
Black or African American	326	57.0
American Indian and Alaska Native	0	0.0
Asian	0	0.0
Asian Indian	0	0.0
Chinese	0	0.0
Filipino	0	0.0
Japanese	0	0.0
Korean	0	0.0
Vietnamese	0	0.0
Other Asian <sup>1</sup>	0	0.0
Native Hawaiian and Other Pacific Islander	0	0.0

Native Hawaiian	0	0.0
Guamanian or Chamorro	0	0.0
Samoa	0	0.0
Other Pacific Islander <sup>2</sup>	0	0.0
Some other race	6	1.0
Two or more races	3	0.5
Race alone or in combination with one or more other races <sup>3</sup>		
White	240	42.0
Black or African American	329	57.5
American Indian and Alaska Native	0	0.0
Asian	0	0.0
Native Hawaiian and Other Pacific Islander	0	0.0
Some other race	6	1.0
HISPANIC OR LATINO AND RACE		
Total population	572	100.0
Hispanic or Latino (of any race)	3	0.5
Mexican	3	0.5
Puerto Rican	0	0.0
Cuban	0	0.0
Other Hispanic or Latino	0	0.0
Not Hispanic or Latino	569	99.5
White alone	237	41.4
RELATIONSHIP		
Total population	572	100.0
In households	572	100.0
Householder	260	45.5
Spouse	85	14.9
Child	159	27.8
Own child under 18 years	114	19.9
Other relatives	52	9.1
Under 18 years	16	2.8
Nonrelatives	16	2.8
Unmarried partner	11	1.9
In group quarters	0	0.0
Institutionalized population	0	0.0
Noninstitutionalized population	0	0.0
HOUSEHOLDS BY TYPE		
Total households	260	100.0
Family households (families)	163	62.7
With own children under 18 years	65	25.0
Married-couple family	85	32.7
With own children under 18 years	21	8.1
Female householder, no husband present	68	26.2
With own children under 18 years	40	15.4
Nonfamily households	97	37.3
Householder living alone	91	35.0
Householder 65 years and over	51	19.6
Households with individuals under 18 years	76	29.2
Households with individuals 65 years and over	100	38.5
Average household size	2.20	(X)
Average family size	2.82	(X)
HOUSING OCCUPANCY		
Total housing units	312	100.0
Occupied housing units	260	83.3

Vacant housing units	52	16.7
For seasonal, recreational, or occasional use	10	3.2
Homeowner vacancy rate (percent)	3.0	(X)
Rental vacancy rate (percent)	3.8	(X)
<b>HOUSING TENURE</b>		
Occupied housing units	260	100.0
Owner-occupied housing units	160	61.5
Renter-occupied housing units	100	38.5
Average household size of owner-occupied unit	2.16	(X)
Average household size of renter-occupied unit	2.27	(X)

(X) Not applicable

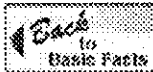
<sup>1</sup> Other Asian alone, or two or more Asian categories.<sup>2</sup> Other Pacific Islander alone, or two or more Native Hawaiian and Other Pacific Islander categories.<sup>3</sup> In combination with one or more other races listed. The six numbers may add to more than the total population and the six percentages may add to more than 100 percent because individuals may report more than one race.

Source: U.S. Census Bureau, Census 2000 Summary File 1, Matrices P1, P3, P4, P8, P9, P12, P13, P17, P18, P19, P20, P23, P27, P28, P33, PCT5, PCT8, PCT11, PCT15, H1, H3, H4, H5, H11, and H12.

***ATTACHMENT 4***

**U.S. Census Bureau**

American FactFinder

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DP-1. General Population and Housing Characteristics: 1990  
 Data Set: [1990 Summary Tape File 1 \(STF 1\) - 100-Percent data](#)  
 Geographic Area: **Midway-Hardwick CDP, Georgia**

NOTE: For information on confidentiality, nonsampling error, and definitions, see  
<http://factfinder.census.gov/home/en/datanotes/expstf190.htm>.

Subject	Number
<b>Total population</b>	<b>4,910</b>
<b>SEX</b>	
Male	2,240
Female	2,670
<b>AGE</b>	
Under 5 years	396
5 to 17 years	1,026
18 to 20 years	244
21 to 24 years	317
25 to 44 years	1,569
45 to 54 years	408
55 to 59 years	162
60 to 64 years	159
65 to 74 years	318
75 to 84 years	218
85 years and over	93
Under 18 years	1,422
65 years and over	629
<b>HOUSEHOLDS BY TYPE</b>	
<b>Total households</b>	<b>1,751</b>
Family households (families)	1,264
Married-couple families	724
Other family, male householder	101
Other family, female householder	439
Nonfamily households	487
Householder living alone	395
Householder 65 years and over	152
Persons living in households	4,713
Persons per household	2.69
<b>GROUP QUARTERS</b>	
Persons living in group quarters	197
Institutionalized persons	184
Other persons in group quarters	13
<b>RACE AND HISPANIC ORIGIN</b>	
White	1,671
Black	3,220
American Indian, Eskimo, or Aleut	3

Asian or Pacific Islander	13
Other race	3
Hispanic origin (of any race)	4
<b>Total housing units</b>	<b>1,978</b>
<b>OCCUPANCY AND TENURE</b>	
Occupied housing units	1,751
Owner occupied	1,192
Renter occupied	559
Vacant housing units	227
For seasonal, recreational, or occasional use	4
Homeowner vacancy rate	1.1
Rental vacancy rate	9.0
Persons per owner-occupied unit	2.79
Persons per renter-occupied unit	2.48
Units with over 1 person per room	116
<b>UNITS IN STRUCTURE</b>	
1-unit detached	944
1-unit attached	10
2 to 4 units	73
5 to 9 units	59
10 or more units	37
Mobile home, trailer, or other	855
<b>VALUE</b>	
Specified owner-occupied housing units	566
Less than \$50,000	391
\$50,000 to \$99,999	162
\$100,000 to \$149,999	12
\$150,000 to \$199,999	1
\$200,000 to \$299,999	0
\$300,000 or more	0
Median (dollars)	39,200
<b>CONTRACT RENT</b>	
Specified renter-occupied housing units paying cash rent	513
Less than \$250	292
\$250 to \$499	219
\$500 to \$749	2
\$750 to \$999	0
\$1,000 or more	0
Median (dollars)	231
<b>RACE AND HISPANIC ORIGIN OF HOUSEHOLDER</b>	
Occupied housing units	1,751
White	671
Black	1,074
American Indian, Eskimo, or Aleut	1
Asian or Pacific Islander	5
Other race	0
Hispanic origin (of any race)	2

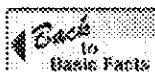
***ATTACHMENT 5***



## U.S. Census Bureau

American FactFinder

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## Quick Tables



DP-1. General Population and Housing Characteristics: 1990  
 Data Set: 1990 Summary Tape File 1 (STF 1) - 100-Percent data  
 Geographic Area: **Crawfordville city, Georgia**

NOTE: For information on confidentiality, nonsampling error, and definitions, see  
<http://factfinder.census.gov/home/en/datanotes/expstf190.htm>.

Subject	Number
<b>Total population</b>	<b>577</b>
<b>SEX</b>	
Male	255
Female	322
<b>AGE</b>	
Under 5 years	44
5 to 17 years	129
18 to 20 years	16
21 to 24 years	29
25 to 44 years	148
45 to 54 years	48
55 to 59 years	16
60 to 64 years	28
65 to 74 years	60
75 to 84 years	43
85 years and over	16
Under 18 years	173
65 years and over	119
<b>HOUSEHOLDS BY TYPE</b>	
<b>Total households</b>	<b>228</b>
Family households (families)	138
Married-couple families	86
Other family, male householder	16
Other family, female householder	36
Nonfamily households	90
Householder living alone	88
Householder 65 years and over	57
Persons living in households	577
Persons per household	2.53
<b>GROUP QUARTERS</b>	
Persons living in group quarters	0
Institutionalized persons	0
Other persons in group quarters	0
<b>RACE AND HISPANIC ORIGIN</b>	
White	229
Black	344
American Indian, Eskimo, or Aleut	0

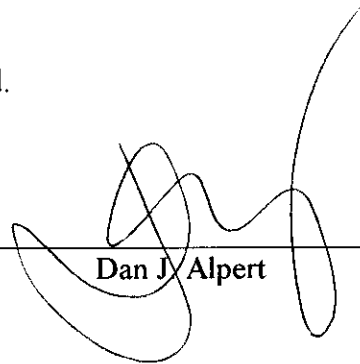
Asian or Pacific Islander	0
Other race	4
Hispanic origin (of any race)	9
<b>Total housing units</b>	<b>271</b>
<b>OCCUPANCY AND TENURE</b>	
Occupied housing units	228
Owner occupied	155
Renter occupied	73
Vacant housing units	43
For seasonal, recreational, or occasional use	14
Homeowner vacancy rate	0.0
Rental vacancy rate	12.0
Persons per owner-occupied unit	2.29
Persons per renter-occupied unit	3.04
Units with over 1 person per room	22
<b>UNITS IN STRUCTURE</b>	
1-unit detached	209
1-unit attached	2
2 to 4 units	3
5 to 9 units	0
10 or more units	0
Mobile home, trailer, or other	57
<b>VALUE</b>	
Specified owner-occupied housing units	99
Less than \$50,000	76
\$50,000 to \$99,999	20
\$100,000 to \$149,999	3
\$150,000 to \$199,999	0
\$200,000 to \$299,999	0
\$300,000 or more	0
Median (dollars)	28,900
<b>CONTRACT RENT</b>	
Specified renter-occupied housing units paying cash rent	58
Less than \$250	56
\$250 to \$499	2
\$500 to \$749	0
\$750 to \$999	0
\$1,000 or more	0
Median (dollars)	99
<b>RACE AND HISPANIC ORIGIN OF HOUSEHOLDER</b>	
Occupied housing units	228
White	114
Black	113
American Indian, Eskimo, or Aleut	0
Asian or Pacific Islander	0
Other race	1
Hispanic origin (of any race)	2

## **CERTIFICATE OF SERVICE**

I, Dan J. Alpert, hereby certify that a true and correct copy of the forgoing Comments and Counterproposal has been served by first class mail on the following:

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Dan J. Alpert